



April 10, 2006

By Electronic Filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: WC Docket Nos. 04-36 and 05-196: Petition for Limited Waiver of Primus
Telecommunications, Inc.

Dear Ms. Dortch:

By this letter, Primus Telecommunications, Inc. ("Primus") updates its Petition for Limited Waiver ("Petition") regarding deployment of E911 service to its Voice over Internet Protocol ("VoIP") customers, filed in the above-referenced dockets on December 16, 2005.

In its Petition, Primus noted that it had two classes of VoIP customers – LD Bypass Service customers and Robust VoIP Service customers. It stated that the LD Bypass Service customers use their VoIP service only for long distance calls. It further stated that, due to the manner in which the VoIP CPE is configured, all 911 calls from subscribers of the LD Bypass Service are handled exclusively through the subscriber's Plain Old Telephone Service ("POTS") line. Primus noted that it had worked diligently to comply with the Commission's E911 rules even though such service would have no practical impact for the vast majority of its customers (the LD Bypass Service Customers). Petition at 3-4.

Primus further noted that, during the period in which it is working on nationwide E911 deployment, Primus customers will have access to its Emergency Calling Services (ECS). *Id.* at 9. It has come to my attention that, at the time Primus filed the Petition, a small number of LD Bypass Service customers without Primus E911 service did not have access to ECS. As noted, this has no practical impact because those customers use their POTS line for 911 service. Nevertheless, Primus is in the process of migrating those customers to a different platform configured to provide them with access to ECS during the period prior to deployment of E911. We anticipate that all such remaining LD Bypass Service Customers (there are 3 as of today) will have access to Primus's ECS or E911 in areas where it is available by approximately April 15,

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2006. We note that Robust VoIP Service customers have had and continue to have access to E911 or ECS service.

Please contact the undersigned if you have any questions or would like any additional information regarding this matter.

Sincerely,

Ravi Bhatia
President

A handwritten signature in blue ink, appearing to read 'Ravi Bhatia', is written over the printed name and title. The signature is stylized with a large, sweeping initial 'R' and a long horizontal stroke extending to the right.

:cjt